REMARKS

Claims 1 and 3-29 have been pending in this application. All claims have been rejected. This rejection is respectfully traversed and further reexamination is requested.

<u>Claim Rejections Under 35 U.S.C. 103</u>

Claims 1 and 3-29 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Chang (U.S. Patent No. 5,873, 263 A) in view of Hanson (U.S. Patent 5,315,521 A) and further in view of Beelitz (U.S. Patent No. 6,182,275 B1). This rejection is respectfully traversed and reconsideration is requested.

The present application is directed toward automatically identifying fluid purification equipment that is needed for a particular fluid purification task and optimizing various components to fit the required fluid purification needs. In order to determine the right equipment, the system uses operator's answers to identify appropriate portions of a database storing information about available fluid purification equipment and identifies and selects data from the database that is directly related to the operator's indicated requirements and/or identifies the next successive path segment through an interactive sequence of questions most applicable to the operator's indicated requirements. The questions do not directly ask the operator to select a particular piece of equipment; rather, they ask about the uses and needs of the fluid purification system, such as, for example, asking the operator to identify the specific gas which is to be purified, whether it is a corrosive or an inert gas. (Specification, page 10, first paragraph.) Neither Chang, Hanson, or Beelitz, nor their combination, teach or suggest automatically identifying fluid purification equipment optimized for particular use in a manner free of user selection of the individual components from a list of available components.

Chang merely discloses one specific fluid purification system and does not discuss the possibility of assembling purchase orders for fluid purification systems automatically based on the indication of the fluid purification needs.

The Examiner acknowledges that Chang does not specifically teach the optimization of the disclosed system, but cites Hanson as teaching the optimization of fluid purification systems through process equipment selection. The Applicants respectfully disagree. Hanson does not teach or suggest automatically selecting the optimized fluid purification equipment. Instead, Hanson teaches a method for optimizing production of one or more products within the constraints of particular production plants and their equipment. The optimization of the

production of a product of Hanson has to specifically <u>work within the limitations of the existing</u> <u>equipment</u>, both with respect to the capacity limitations and costs (Column 1, lines 55-65). Nowhere does Hanson teach or suggest automatically selecting the equipment optimized for a particular fluid purification task.

There is no motivation to combine the teachings of Chang, Hanson, and Beelitz, not only because they operate in the different fields of enterprise, but also because each system is not capable of being modified by the other teaching. For example, there would be no motivation to combine the system of Hanson with the system of Beelitz because Hansen addresses optimizing product production using <u>existing equipment</u>, and does not deal at all with selecting products or equipment. Likewise, Beelitz is concerned only with selecting computer parts that are compatible with each other and is not concerned with optimizing the use to which an assembled computer is put, as would be analogous to the system of Hanson. Therefore, the combination of Chang, Hanson and Beelitz is improper and the rejection should be withdrawn.

Even if Chang, Hanson, and Beelitz were to be combined, *arguendo*, the resulting system would not render independent Claims 1, 28 and 29 obvious, because neither Beelitz by itself, nor all the cited references taken together teach or suggest automatically identifying a fluid purification equipment in it's entirety that is formed of individual components in a manner free of user selection of the individual components from a list.

Beelitz merely teaches a system of presenting a user with a list of selectable components that are compatible with a previously selected component. (Beelitz, Abstract, lines 1-10). The questions that Beelitz asks of the operator relate not to the use to which this particular hardware would be put, but the selection of the hardware itself <u>from the list of available parts</u>. Beelitz is in an entirely separate field of enterprise, but, even if the present application were to be in the same field as Beelitz, it would translate to a system where the user is asked not to select particular components, but to select the applications to which those components would be used, for example, whether a particular computer system would be used for mathematical computations, graphic design, or computer gaming with the automated system then determining components that are not only compatible with each other, but are also optimally suited for the particular application. Clearly, Beelitz is nowhere near that level of sophistication and does not teach or suggest having such an optimization system. Instead, Beelitz provides users with lists of software program options or other options for individual user selection. (See Beelitz, column 18, line 60 through column 19, line 3.) For example, referring to Figures 2-6 of Beelitz, a user builds

a customized computer system by selecting individual components from compatible lists of processor types, RAM, operating systems, software programs, etc.

Thus, Beelitz does not teach or suggest automatically identifying components of a computer system in its entirety using defining information regarding the operating environment in which the computer system is intended to operate in a manner free of user selection of individual components from a list. In contrast, the present invention as recited in independent Claims 1, 28 and 29 uses defining information regarding a particular fluid purification system, such as operating parameters of the system, to automatically identify a resulting set of components for fluid purification equipment package that satisfies the operating parameters of a particular fluid purification system in which the equipment package is intended to operate. In other words, the invention system, as opposed to the user, selects which components are to be a part of the overall fluid purification equipment.

Neither Chang nor Hanson rectify the failing of Beelitz to teach a system for automatically selecting components appropriate for a particular use in fluid purification systems. Therefore, independent Claims 1, 28 and 29 are not obvious in view of the combination of Chang, Hanson and Beelitz, and the rejection should be withdrawn. Dependent Claims 3-27 depend on independent Claim 1 and are not obvious in view of the combination of Chang, Hanson, and Beelitz for at least the same reasons above.

CONCLUSION

In view of the above amendments and remarks, it is believed that all claims are in condition for allowance, and it is respectfully requested that the application be passed to issue. If the Examiner feels that a telephone conference would expedite prosecution of this case, the Examiner is invited to call the undersigned.

Respectfully submitted,

HAMILTON, BROOK, SMITH & REYNOLDS, P.C.

By _Lubashev_

Lyudmila Lubashev
Registration No. 55,408
Telephone: (978) 341-0036
Facsimile: (978) 341-0136

Concord, MA 01742-9133
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